

**CWWTPR DCO Examination****Submission by Save Honey Hill Group 6 December 2023****SHH Response to Cambridge City Council Local Impact Report REP1-128**

Save Honey Hill Group's responses follows the structure of the Cambridge City Council LIR and notes the references to RR-002, the Council's Relevant Representation.

<b>Local Impact Report Paragraph References</b>	<b>SHH Response</b>	<b>References to SHH or Other Submissions</b>
3.2; 3.3	The existing CWWTP is described as a brownfield site while it is, in fact, an urban industrial site and is not lying unused. The proposed relocation site is described as greenfield; in fact, it forms part of the Green Belt around Cambridge, meeting the description and objectives of NPPF.	REP1-171 SHH Written Representation section 7.2.1
4.1; 4.3	The references to NPSWW's and NPSWRI's guidance on NSIPS do not apply as the Applicant has agreed that the PD is not an NSIP.	REP1-170 SHH ISH2 summary section 2.2
4.6; 4.8	The LIR sets out the sections of NPPF policies which it considers are relevant to the Application; SHH has challenged the Applicant's compliance with NPPF paras 149 and 150. SHH questions why City Council has not considered the following NPPF policies as relevant: Paras 174, 179, 180 and 182 Conserving and enhancing the natural environment.	REP1-171 SHH Written Representation section 7.2.1
<b>Impact by Topic</b>		
<b>Topic 1</b>	<b>Strategic Development Plan Context</b>	
6.27	SHH agrees that relocation of the CWWTP is not a policy requirement of the adopted 2018 Local Plans and that there was no reliance upon any employment or residential development to 2031 at the current site.	
6.31	For the reasons given in Section 4.3 of SHH's RR, SHH's WR and expanded orally at ISH 2, very limited weight attaches to the emerging Greater Cambridge Local Plan and NECAAP. In any event,	REP1-170 SHH ISH2 summary section 2.2

	neither emerging plan provides any policy requirement or support for relocation, as both are predicated on it already having happened before the plans proceed to examination.	
6.35	As demonstrated in the SHH WR, sufficient housing delivery can be accomplished without the need for CWWTP relocation to enable NECAAP.	REP1-171 SHH Written Representation section 7.2.1
6.64	SHH has provided a more detailed view of sustainable alternatives to NECAAP CWWTP and City council owned land housing allocation in SHH Written Representation.	REP1-171 SHH Written Representation section 6.6.1
6.67; 6.68	SHH agrees with the Environment Agency's and Cambridge Water's concerns about the level of development that can be served with a sustainable water supply, given that the WRMP has not been concluded.	RR - 013
6.70	SHH agrees that the Local Development Scheme needs to be updated when there is greater clarity on water supply. The Joint Development Control Committee's recommendation that additional development at Darwin Green should be refused was partly on the issue of Water Resources.	REP1-173 JDDCC meeting Darwin Green REP1-171 SHH Written Representation section 4.3.2
6.71	SHH disagrees that the water supply situation will not delay taking forward NECAAP. Continuing development in Cambridge is dependent on new large scale water transfer into Cambridge, plans for which are not well advanced and at the earliest will deliver some new supplies after 2033. The Cambridge Water Company Water Resources Plan is not yet approved, and the issue has necessitated a Task Force to be appointed by Government as confirmed by Stephen Kelly for GCSP at ISH 2.	
6.74	SHH questions the timescale for delivery of a new Fens reservoir to become operational by mid-2030s as it has not progressed beyond Phase 1 consultation <sup>1</sup> . Thames Water's planned South East Strategic Reservoir Option (Sesro) is expected to take 8 years to construct and two years to fill before becoming operational <sup>2</sup> .	

<sup>1</sup> Anglian Water Fens Reservoir <https://www.fensreservoir.co.uk>

<sup>2</sup> New Civil Engineer – Future of water 23 November 2023.

6.80	SHH does not believe that the only alternative to NEC Is to focus on the 'Edge of Cambridge in the Green Belt Location' and 'New settlements. SHH identified sufficient capacity in new and established settlements.	REP1-171 SHH Written Representation section 6.7
6.87	The LIR predicts first housing delivery on City-owned sites by 2028. However, given their location, this would require total decommissioning and remediation of the current WWTP before this development can take place. The impact of dust, noise and transport caused by demolition and decontamination of the WWTP on this new housing has not been considered.	
6.91	The Council underestimates the level of objection to the principle of NECAAP which were not only on the proposed move of the WWTP to Honey Hill and hence impact on Green Belt and carbon footprint. GCSP consulted on the draft plan July to October 2020. Concerns on the water environment and lack of on-site recreational space were raised by Natural England, Cam and Ely Ouse Catchment Partnership, Endurance Estates and Fen Ditton Village Society. Others cited the lack of places of worship and other facilities, the height of buildings and excessive density of homes and questioned achievement of BNG.	Draft NECAAP Representations <sup>3</sup>
6.100	SHH has addressed the issues concerned with release of land at current site and upgrading the plant with examples of other WWTP upgrades.	REP1-171 SHH Written Representation section 4.5
6.105	The adopted Local Plans 2018 of both Cambridge City Council and SCDC did not make policy provision for development on Green Belt. The emerging Local Plans have not been tested. The proposal to use Green Belt now is therefore contrary to the 2018 SCDC LP Green Belt policies and the City Council, in advocating the relocation of the WWTP to facilitate NECAAP, is disregarding adopted SCDC policy.	
6.106	SHH questions the statement '...Cambridge City Council, as LPA, is not privy to the details of the contract or agreement with Homes England...'. SHH understands that Cambridge City Council is fully involved in the delivery and has, for example, been administering the enabling section of the HIF grant to Anglian Water as shown in its Freedom of Information response number FOI/29 27 November 2023. The response shows that Cambridge City Council approved and settled Anglian Water's claims totalling £27.7m to date from the enabling portion of the HIF grant.	FOI/29 27/11/23 (not yet published on City Council FOI website)

<sup>3</sup> <https://oc2.greatercambridgeplanning.org/readdoc/213/searchrepresentations>

6.109	The Executive Councillor for Planning, Building Control and Infrastructure Approved the NECAAP Regulation 19 submission on 11 January 2022, but both it, and the Draft Final Sustainability Report and Habitats Regulation Assessment, have yet to be subjected to public consultation. <sup>4</sup> Therefore, a high degree of certainty that the NECAAP will be adopted, should not be assumed.	
6.111 to 6.119	These sections are largely reiterations of previous statements which have been addressed by SHH above and in the SHH 04 Written Representation.	
<b>Topic t2</b>	<b>Carbon</b>	
7.2; 7.5; 7.6	SHH has disagreed with the approach taken by Anglian Water to assessing carbon emissions, in its Relevant Representation, Written Representation and in the report by Cambridge University Engineering Department. The assessment of carbon emissions from demolition of the CWWTP, which is within Cambridge City, is a notable omission from the Applicant's assessment.	RR-035 Relevant Representation. REP1-171 SHH Written Representation section 4.5: REP1-173 CUED Greenhouse Gas Emissions Accounting for Demolition CWWTP
7.10 to 7.14	SHH agrees that there are no known positive impacts associated with the Construction period and considerable negative impacts.	REP1-171 SHH Written Representation section p 83
7.23	SHH agrees that the operational impact of both options would have an adverse impact. The applicant has not yet committed to the DCO preferred option, the delivery of enriched biogas to the national gas network.	REP1-171 SHH Written Representation section p 85
7.28	SHH agrees that adoption of the CHP option would give rise to significant adverse Impact by carbon emissions.	
7.30	SHH agrees and has asked AW to commit to delivering net zero operational carbon and to the methods by which this will be achieved prior to any approval of the dDCO, see Schedule 2 Requirement 21.	

<sup>4</sup> <https://democracy.cambridge.gov.uk/ieDecisionDetails.aspx?Id=5322>

<b>Topic 3</b>	<b>Noise and vibration</b>	
8.7, 8.12, 8.13	SSH agrees that residential properties are highly sensitive noise receptors and that this has been under estimated in the Application. This will apply both to residential properties affected by decommissioning, demolition and remediation activities and the construction traffic at the PD. Noise & vibration associated with demolition and remediation have not been scoped in.	REP1-171 SHH Written Representation section 10.3.4 (iii)
<b>Topic 4</b>	<b>Odour impacts</b>	
9.7 to 9.13	SHH agrees that further detail on the prevention of odour should be included in the Decommissioning Plan. As the Applicant and City Council have not considered the impact of demolition and remediation, associated odour risks have not been identified.	
<b>Topic 5</b>	<b>Land Quality and Contamination</b>	
10.1 to 10.15	The inability to excavate the site to estimate ground contamination until after demolition, the responsibility for which has been passed to the developers, appears to be in breach of Policy 33 of the Cambridge City Local Plan. <sup>5</sup>	CLP Policy 33 d
<b>Topic 6</b>	<b>Air Quality Impacts</b>	
<b>11.9</b>	SHH notes that there will be a reduction in HGV vehicles within the locality of Cowley Road and Milton Road and therefore a reduction in vehicle emissions in the area. These HGV movements and emissions will however be transferred to J34 of the A14, Fen Ditton and Horningsea.	
<b>Topic 7</b>	<b>Public Health</b>	
12.5	SHH does not agree with the Applicant's approach to Methodology of Health Impacts associated with the PD.	REP1-171 SHH Written Representation section 10.3
12.9 & 12.22	SHH agrees that there are a number of negative Impacts In relation to odour, noise, light, vibration and air quality both during construction and operation.	

<sup>5</sup> <https://www.cambridge.gov.uk/media/6890/local-plan-2018.pdf>

12.33	SHH agrees that mitigation should be secured, and further assessments should be undertaken to monitor change.	REP1-171 SHH Written Representation section 10.3.5
<b>Topic 8</b>	<b>Community impact</b>	
13.5	SHH does not agree that impact on community is minimal. Communities in the North of the City, e.g. Barnwell, Newmarket Road, Abbey, will be impacted by the access construction traffic and congestion at A14 Junction 34.	
<b>Topic 9</b>	<b>Highways and Transportation</b>	
14.6	SHH agrees that there may be a cumulative negative impact on traffic within Cambridge City and notes specific impact on Barnwell Road, Newmarket Road for traffic travelling north to A14 Junction 34, especially during construction and for traffic leaving junction 34 to travel south into Cambridge City.	